

On Wed, Oct 2, 2013 at 9:06 AM, Keith Horvath, MD <KHorvath@suburbanhospital.org> wrote:

Dear Ms Fleck et al

Thank you for your email and the link to the draft of the regulations.

Upon review there are a few corrections to consider.

p.23 Section 4 Quality (under the heading of Cardiac Surgery)

b) states that "The hospital shall conduct an annual external review of five percent of randomly selected cardiac surgery cases"

Previous discussions of the CAG had indicated for Cardiac Surgery this auditing process would come through the STS audit. Would the STS audit qualify?

c) states the annual review of each cardiac surgeon will consist of At least 10 cases or 10 percent of randomly selected PCI cases performed by the cardiac surgeon, whichever is greater. This would apply to interventional cardiologists and not surgeons. The subsequent points about the review process also appear to apply to cardiologists and not surgeons. Perhaps this section was misplaced (or simply recopied from the PCI section) when the draft was constructed as the surgical quality measures discussed at the CAG meetings focused on the risk adjusted morbidity and mortality derived from the data submitted to the STS database and then annually submitted to the MHCC. The annual external auditing, individual practitioner reviews, and angiogram adjudication was intended for PCI programs, not for Cardiac Surgery.

Thanks again,

K Horvath